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UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re

CASH CLOUD, INC.,
dba COIN CLOUD,

Debtor.

Case No. BK-23-10423-mkn

Chapter 11

**DECLARATION OF BRETT AXELROD IN
SUPPORT OF OPPOSITION TO MOTION
FOR LEAVE TO FILE LATE PROOF OF
ADMINISTRATIVE CLAIM OR IN THE
ALTERNATIVE, FOR AN ORDER
VACATING THE ADMINISTRATIVE
CLAIM BAR DATE ORDER**

Hearing Date: November 30, 2023

Hearing Time: 10:30 a.m.

I, Brett A. Axelrod, hereby declare as follows:

1. I am a partner of Fox Rothschild, which maintains offices at, among other locations:

1980 Festival Plaza Drive, Suite 700, Las Vegas, Nevada 89135.

2. I am over the age of 18, am mentally competent, have personal knowledge of the facts in this matter, except where stated as based upon information and belief, and if called upon to testify, could and would do so.

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3. I submit this declaration (the “Declaration”) in support of the Opposition To Motion For Leave To File Late Proof Of Administrative Claim Or In The Alternative, For An Order Vacating The Administrative Claim Bar Date Order (“Opposition”).¹

4. The Debtor will be prejudiced if leave is granted to allow TSSP’s late-filed administrative expense claim. The Debtor requested that the Administrative Claim Bar Date be set for July 20, 2023 due to the pending confirmation of the Debtor’s plan of reorganization set for July 27, 2023 and the need for a deadline to be set for administrative expense claims to be filed so that the universe of such claims and their amount could be determined for payment through the plan. The Debtor has already engaged in the claims reconciliation process and filed its objections to administrative expense claims and determined the amount of administrative claims that were filed by Administrative Claim Bar Date. Extending the bar date would have an adverse impact on the Debtor’s efforts to conclude the claims reconciliation process. Further, I provided creditors with information regarding the Debtor’s calculation of the timely filed administrative expense claims, so that these creditors could determine their estimated distributions and based on this information determine how they would cast their ballots on the plan.

I declare, under penalty of perjury of the laws of the United States of America, that the foregoing statements are true and correct to the best of information, knowledge and belief.

Executed this 16th day of November, 2023.

/s/ Brett Axelrod

Brett Axelrod

¹ Capitalized terms used but not otherwise defined herein shall have the meanings ascribed to them in the Opposition.